

FILED  
U.S. DISTRICT COURT  
DISTRICT OF WYOMING

2023 MAR -9 AM 9:35

MARGARET DOTKINS, CLERK  
CHEYENNE

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF WYOMING

UNITED STATES OF AMERICA,

Plaintiff,

v.

CARRISA J. DUNN-POLLARD,

Defendant.

No.

23-cr-24-J

Ct 1: 18 U.S.C. § 1343

(Wire Fraud)

Ct 2: 26 U.S.C. § 7203

(Failure to File Tax Return (tax  
year 2021))

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INFORMATION

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THE UNITED STATES ATTORNEY CHARGES THAT:

**INTRODUCTORY ALLEGATIONS**

1. At all times material to this Information, the Defendant, **CARRISA J. DUNN-POLLARD**, was a resident of Cheyenne, Wyoming, located in the District of Wyoming.

2. The Internal Revenue Service (IRS) is an agency of the United States within the Department of the Treasury, and is responsible for enforcing and administering the tax laws of the United States.

3. The federal income tax system relies upon individuals to report accurate financial information to the IRS, including by filing income tax returns when their gross income exceeds the applicable minimum amount provided by law. For married persons filing separately the minimum amount of gross income that triggers the filing requirement is \$5.

4. At all times material to this Information, the Defendant, **CARRISA J. DUNN-POLLARD**, was employed as a part-time bookkeeper at Cheyenne Little Theatre Players, Inc. (the Theatre), a non-profit theatre company in Cheyenne, Wyoming.

5. In tax year 2021, the Defendant, **CARRISA J. DUNN-POLLARD**, in her capacity as the part-time bookkeeper for the Theatre, caused the Theatre to make payroll deposits into her bank account totaling \$196,135. In addition, the Defendant, **CARRISA J. DUNN-POLLARD**, received income from several other sources in tax year 2021. As a result, her total gross income for tax year 2021 was at least \$278,598.

### **COUNT ONE**

Paragraphs 1-5 are hereby re-alleged for the purpose charging Count One.

From on or about September 20, 2020, through and including on or about May 30, 2022, in the District of Wyoming, the Defendant, **CARRISA J. DUNN-POLLARD**, knowingly devised and intended to devise a scheme and artifice to defraud and to obtain money by means of false and fraudulent pretenses, representations, and promises (“scheme”), in an amount totaling at least \$220,481.57, which scheme was furthered by the use of interstate wire communications. The Defendant, **CARRISA J. DUNN-POLLARD**, engaged in the scheme substantially as follows:

It was a part of the scheme that Defendant, **CARRISA J. DUNN-POLLARD**, was employed as a bookkeeper at the Theatre and that as part of her duties, she was responsible for maintaining the financial records, including paying bills, managing payroll, and submitting financial reports to management.

It was further a part of the scheme that the Defendant diverted the financial assets of the Theatre for her own personal use and falsified financial records to hide her scheme.

On or about December 7, 2021, in the District of Wyoming, the Defendant **CARRISA J. DUNN-POLLARD**, for the purpose of executing and attempting to execute the scheme as described above, caused to be transmitted in interstate commerce by means of wire

communication, certain signs, signals, and sounds, to wit: an unauthorized ACH "Payroll Deposit" of \$6,000 into the Defendant's bank account ending 1845 from the Theatre's bank account ending 2065.

In violation of 18 U.S.C. § 1343.

**COUNT TWO**

Paragraphs 1-5 are hereby re-alleged for the purpose charging Count Two.

During the calendar year 2021, the Defendant, **CARRISA J. DUNN-POLLARD**, received gross income in excess of \$5. By reason of that gross income, she was required by law, following the close of the calendar year 2021 and on or before April 18, 2022, to make an individual income tax return to the designated Internal Revenue Service Center, at Cheyenne, Wyoming, to the person assigned to received returns at the local office of the Internal Revenue Service at Cheyenne, Wyoming, or to another Internal Revenue Service office permitted by the Commissioner of Internal Revenue, stating specifically the items of her gross income and any deductions and credits to which she was entitled. Well knowing and believing all the foregoing, she did willfully fail, on or about April 18, 2022, in the District of Wyoming and elsewhere, to make an individual income tax return.

In violation of 26 U.S.C. § 7203.

DATED this 7th day of March, 2023.

NICHOLAS VASSALLO  
United States Attorney

By:



MARGARET M. VIERBUCHEN  
Assistant United States Attorney

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**PENALTY SUMMARY**

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**DEFENDANT NAME:** CARRISA J. DUNN-POLLARD

**DATE:** March 7, 2023

**INTERPRETER NEEDED:** No

**VICTIM(S):** Yes

**OFFENSE/PENALTIES:**

**Ct: 1 18 U.S.C. § 1343**  
(Wire Fraud)

0-20 Years Imprisonment  
Up To \$250,000 Fine  
3 Years Supervised Release  
\$100 Special Assessment

**Ct: 2 26 U.S.C. § 7203**  
(Failure to File Tax Return (tax year 2021))

0-1 Year Imprisonment  
Up To \$25,000  
1 Year Supervised Release  
\$25 Special Assessment

**TOTALS:** 0-21 Years Imprisonment  
Up To \$275,000  
3 Years Supervised Release  
\$125 Special Assessment

**AGENTS:** Russell Sparks, USSS  
Joanna Neal, IRS

**AUSA:** Margaret M. Vierbuchen, Assistant United States Attorney

**ESTIMATED TIME OF TRIAL:** 1 to 5 days

**WILL THE GOVERNMENT SEEK DETENTION IN THIS CASE:** No

**ARE THERE DETAINERS FROM OTHER JURISDICTIONS:** No